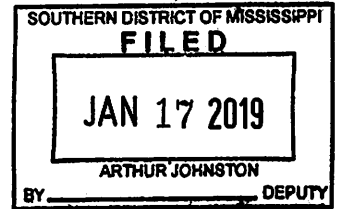


**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v. CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &  
DANIEL ABEL, D/B/A/ TROUT POINT  
LODGE LTD OF NOVA SCOTIA & IN  
THEIR INDIVIDUAL CAPACITIES  
PROGRESS MEDIA GROUP LIMITED,  
MARILYN SMULDERS, & ASHOKA

**DECLARATION OF DOUGLAS HANDSHOE**

I Douglas Handshoe, declare the following to be true and correct, and if called as a witness, I could competently testify to the matters hereinafter set forth which are within my personal knowledge. Under penalty of perjury I, swear and affirm the following:

**CASE SUMMARY**

I am the Plaintiff / Counter defendant in this matter. This is a case about the misuse of the United States copyright laws as one of many tactics in a campaign of libel terrorism and related Canadian smear campaigns directed towards Plaintiff and Plaintiff's lawyers in Mississippi and Louisiana from Canada, a country without the Free Speech and procedural due process protections contained in the United States Constitution, in an attempt to suppress truthful reporting on matters

in the public court record involving a massive political corruption scandal, resulting criminal investigation, conviction and incarceration of former Jefferson Parish President Aaron Broussard. In one of many such corrupt self-enrichment schemes perpetrated by Broussard, he used his Canadian property holdings managed by his unindicted criminal co-conspirators, Charles Leary, Vaughn Perret and Daniel Abel, to perpetrate bribery and money laundering schemes involving politically connected individuals that did substantial business with the Parish of Jefferson, Louisiana.

#### **DECLARATION OF FACTS AND EVIDENCE SUPPORTING JUDGMENT**

1. At all times I have conducted this litigation in good faith and with the utmost of diligence. This is especially true given my status as a pro se litigant.
2. That at all time periods between the 2012 barrage of takedown notices and the filing of the Complaint, that Handshoe did his best to research the issues involved and even waited for *Lenz* to resolve in order to ascertain his legal rights.
3. That I considered and formed a good faith belief, before the submission of every counter notifications, that the material cited in the numerous takedown notices including the January 6, 2016 notice was being used on the Slabbed New Media website was being used under the fair use provisions of the Copyright Act or could not have met the definition of infringement.

4. Attached to this Declaration are the following Exhibits:

Exhibit A - Declaration of Douglas Handshoe.

Exhibit 1 – Leary affidavit dated July 25, 2012.

Exhibit 2 – Leary affidavit dated May 12, 2011.

Exhibit 3 – Threatening letter to Handshoe sent in May, 2011.

Exhibit 4 – Real-Malice blog web posting.

Exhibit 5 – Real-Malice blog web posting.

Exhibit 6 – American Zombie blog web posting.

Exhibit 7 – Leary and Perret Amicus Brief in sealed lawsuit.

Exhibit 8 – Sealed court filings Exhibited by Leary in 12cv90.

Exhibit 9 – Leary affidavit dated June 13, 2011.

Exhibit 10 – Leary emails to Amazon Web Services regarding takedown

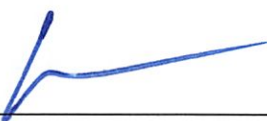
Exhibit 11 – Slabbed blog web posting showing inline linked photograph re Leary's takedown notice to AWS..

Exhibit 12 - Slabbed blog web posting illustrating fair use re Leary's takedown notice to AWS.

Exhibit 13 - Slabbed blog web posting demonstrating fair use.

I swear and affirm I have examined the Exhibit 1 through 13 and they are true and correct in all respects.

So certified this the 17<sup>th</sup> day of January, 2019,



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Douglas Handshoe  
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(601) 928-5380  
[earning04@gmail.com](mailto:earning04@gmail.com)

### **CERTIFICATE OF SERVICE**

I, Douglas Handshoe, hereby certify that on January 17, 2019 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on January 17, 2019, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada

Respectfully submitted this 17<sup>th</sup> day of January, 2019,



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